

Ms. Christy Miller
Tower Structural Laminating, Inc.
1491 Gerber Street
Ligonier, Indiana 46767

RE: 113-12732-00049
Second Administrative Amendment to
Title V 113-7113-00049

Dear Ms. Miller:

Tower Structural was issued a permit on April 18, 2000 for a manufacture of fiberglass reinforced plywood panels. A letter requesting a significant source modification (113-12529-00049) was received on August 4, 2000. Pursuant to the provisions of 326 IAC 2-711, the permit is hereby administratively amended as follows:

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates

Responsible Official:	Omer Kropf
Source Address:	P.O. Box 463, Goshen, Indiana 46526
Mailing Address:	1491 Gerber Street, Ligonier, Indiana 46767
Phone Number:	(219) 642-4888
SIC Code:	3089
County Location:	Noble
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Minor Source, under PSD or Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Fiberglass continuous lamination and chop machine identified as SV1-1, with a maximum capacity of 86 parts per hour, no particulate control equipment, no external exhaust.
- (b) Two (2) ~~bulk-resin~~ storage tanks, with a maximum capacity of 6,000 gallons each.
- (c) **One (1) Fluid Impingement Technology attached to the Continuous Lamination Machine, identified as SV1-4, with a maximum capacity of gel coating 299.25 pounds of fiberglass reinforced plywood panels per hour, no particulate control equipment, no external exhaust.**
- (d) **One (1) gel coat storage tank, with a maximum capacity of 4,000 gallons.**

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)]
[326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) btu per hour.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F) or;
 - (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Infrared cure equipment.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5 (15)]:

- (c) **One (1) Fluid Impingement Technology attached to the Continuous Lamination Machine, identified as SV1-4, with a maximum capacity of gel coating 299.25 pounds of fiberglass reinforced plywood panels per hour, no particulate control equipment, no external exhaust.**
- (d) **One (1) gel coat storage tank, with a maximum capacity of 4,000 gallons.**

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

This facility shall use less than 25 tons of VOC per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year

for the entire source. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 VOC Emissions [326 IAC 8-1-6]

The VOCs input to the gel coater shall be limited to less than twenty-five (25) tons per year per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; general reduction requirements) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(a)]

The PM from the Fluid Impingement Technology shall not exceed the pound per hour emission rate established is E in the following formula:

Interpolation and extrapolation of the data for the process weight up to sixty thousand (60,000) pounds per hour shall be accompanied by use of the equation:

$$E = 4.10 P^{0.67}$$

Where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Conditions D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent (12) month period.

Record Keeping and Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2.
- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data

sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

- (2) A log of the dates of use;**
 - (3) The cleanup solvent usage for each month;**
 - (4) The total VOC usage for each month; and**
 - (5) The weight of VOCs emitted for each compliance period.**
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.**

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Tower Structural Laminating Inc.
Source Address: 1491 Gerber Street, Ligonier, Indiana 46767
Mailing Address: P.O. Box 463, Goshen, Indiana 46526
Part 70 Permit No.: T113-7113-00049
Facility: Fluid impingement technology for gel coating
Parameter: VOC
Limit: Less than 25 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 **No deviation occurred in this quarter.**
- 9 **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. Pursuant to Contract No. A305-0-00-36, IDEM, OAQ has assigned the processing of this application to Eastern Research Group, Inc., (ERG). Therefore, questions should be directed to Regi Oommen, ERG, P.O. Box 2010, Morrisville, North Carolina 27560, or call (919) 468-7829 to speak directly to Mr. Oommen. Questions may also be directed to Duane Van Laningham at IDEM, OAQ, 100 North Senate Avenue, P.O. Box 6015, Indianapolis, Indiana, 46206-6015, or call (800) 451-6027, press 0 and ask for Duane Van Laningham, or extension 3-6878, or dial (317) 233-6878.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

ERG/RGO

cc: File - Noble
U.S. EPA, Region V
Noble County Health Department
Air Compliance Section Inspector - Doyle Houser
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT

Office of Air Quality

Tower Structural Laminating Inc.
1491 Gerber Street
Ligonier, Indiana 46767

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T113-7113-00049	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: April 18, 2000

First Administrative Amendment No. 113-12657-00049 issued on October 5, 2000

Second Administrative Amendment No: 113-12732-00049	Issuance Date:
Issued by: Paul Dubentzky, Chief of Permits Branch Office of Air Quality	Affected pages: 2, 3, 4, 4a, 30, 30a, 34a

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- D.1.2 VOC Emissions [326 IAC 8-1-6]
- D.1.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
- D.1.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

Compliance Determination Requirements

- D.1.5 Testing Requirements [326 IAC 2-7-6(1),(6)] [326 IAC 2-1.1-11]
- D.1.6 Volatile Organic Compounds (VOC)
- D.1.7 VOC Emissions

Compliance Monitoring Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.8 Particulate Matter (PM)

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.1.9 Record Keeping Requirements
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Emission Limitations and Standards [326 IAC 2-7-5(1)]

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- D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(c)]
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- D.2.7 VOC Emissions

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

- D.2.8 Record Keeping Requirements
- D.2.9 Reporting Requirements

Certification

Emergency/Deviation Occurrence Report

Quarterly Report

Quarterly Compliance Monitoring Report

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates

Responsible Official: Omer Kropf
Source Address: P.O. Box 463, Goshen, Indiana 46526
Mailing Address: 1491 Gerber Street, Ligonier, Indiana 46767
Phone Number: (219) 642-4888
SIC Code: 3089
County Location: Noble
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD or Emission Offset Rules;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) Fiberglass continuous lamination and chop machine identified as SV1-1, with a maximum capacity of 86 parts per hour, no particulate control equipment, no external exhaust.
- (b) Two (2) resin storage tanks, with a maximum capacity of 6,000 gallons each.
- (c) One (1) Fluid Impingement Technology attached to the Continuous Lamination Machine, identified as SV1-4, with a maximum capacity of gel coating 299.25 pounds of fiberglass reinforced plywood panels per hour, no particulate control equipment, no external exhaust.
- (d) One (1) gel coat storage tank, with a maximum capacity of 4,000 gallons.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) btu per hour.
- (b) Storage tanks with capacity less than or equal to 1,000 gallons and annual throughputs less than 12,000 gallons.
- (c) Cleaners and solvents characterized as follows:
 - (1) having a vapor pressure equal to or less than 2 kPa; 15mm Hg; or 0.3 psi measured at 38 degrees C (100E F) or;

- (2) having a vapor pressure equal to or less than 0.7 kPa; 5mm Hg; or 0.1 psi measured at 20EC (68EF); the use of which for all cleaners and solvents combined does not exceed 145 gallons per 12 months.
- (d) Infrared cure equipment.

SECTION D.2

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5 (15)]:

- (c) One (1) Fluid Impingement Technology attached to the Continuous Lamination Machine, identified as SV1-4, with a maximum capacity of gel coating 299.25 pounds of fiberglass reinforced plywood panels per hour, no particulate control equipment, no external exhaust.
- (d) One (1) gel coat storage tank, with a maximum capacity of 4,000 gallons.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 PSD Minor Limit [326 IAC 2-2] [40 CFR 52.21]

This facility shall use less than twenty-five (25) tons of VOC per 12 consecutive month period. This usage limit is required to limit the potential to emit of VOC to less than 250 tons per year. Compliance with this limit makes 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 not applicable.

D.2.2 VOC Emissions [326 IAC 8-1-6]

The VOCs input to the gel coater shall be limited to less than twenty-five (25) tons per year per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (New Facilities; general reduction requirements) not applicable.

D.2.3 Particulate Matter (PM) [326 IAC 6-3-2(a)]

The PM from the fluid impingement technology shall not exceed the pound per hour emission rate established is E in the following formula:

Interpolation and extrapolation of the data for the process weight up to sixty thousand (60,000) pounds per hour shall be accompanied by use of the equation:

$$E = 4.10 P^{0.67} \quad \text{Where } E = \text{rate of emission in pounds per hour; and} \\ P = \text{process weight rate in tons per hour}$$

D.2.4 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

Compliance Determination Requirements

D.2.5 Testing Requirements [326 IAC 2-7-6(1),(6)][326 IAC 2-1.1-11]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.2.1 and D.2.2 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.2.6 Volatile Organic Compounds (VOC)

Compliance with the VOC content and usage limitations contained in Conditions D.2.1 and D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 VOC Emissions

Compliance with Conditions D.2.1 and D.2.2 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.8 Record Keeping Requirements

- (a) To document compliance with Conditions D.2.1 and D.2.2, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.2.1 and D.2.2.
 - (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
 - (2) A log of the dates of use;
 - (3) The cleanup solvent usage for each month;
 - (4) The total VOC usage for each month; and
 - (5) The weight of VOCs emitted for each compliance period.
- (b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.9 Reporting Requirements

A quarterly summary of the information to document compliance with Conditions D.2.1 and D.2.2 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Air Quality
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Tower Structural Laminating Inc.
Source Address: 1491 Gerber Street, Ligonier, Indiana 46767
Mailing Address: P.O. Box 463, Goshen, Indiana 46526
Part 70 Permit No.: T113-7113-00049
Facility: Fluid Impingement Technology for gel coating (SV1-4)
Parameter: VOC
Limit: Less than 25 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

A certification is not required for this report.